

From: [Bob Stoddard](#)  
To: [Russell Wasem/DC/USEPA/US@EPA](#)  
Cc: [John Hebert/DC/USEPA/US@EPA](#); [Dan Peacock/DC/USEPA/US@EPA](#); [Laura Parsons/DC/USEPA/US@EPA](#)  
Subject: Re: Rodenticides  
Date: 10/25/2011 09:27 AM

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When did this change go into affect? What regulation or law is this under? Can you provide me a link to a website that discusses these requirements? Also, prior to this recent change what were the requirements for labeling a bait station? Thanks so much I am doing a presentation for schools and want to make sure I provide accurate information.

Bob

Sent from my iPhone

On Oct 25, 2011, at 8:39 AM, Wasem.Russell@epamail.epa.gov wrote:

>  
> Good Morning Bob,  
>  
> Please see the email below for what is required to be on bait stations.  
> If you have any further labeling or registration questions, please  
> contact my colleagues Dan Peacock and John Hebert (Both CC'ed).

> Regards,

> Rusty\_\_\_\_\_

>  
> Rusty Wasem / Chemical Review Manager  
> Risk Management & Implementation Branch 1\*  
> Pesticide Re-evaluation Division\* / Office of Pesticide Programs  
> 703 / 305 6979  
> ----- Forwarded by Russell Wasem/DC/USEPA/US on 10/25/2011 08:12 AM  
> -----

> From: John Hebert/DC/USEPA/US  
> To: Russell Wasem/DC/USEPA/US@EPA  
> Cc: Dan Peacock/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA  
> Date: 10/25/2011 08:08 AM  
> Subject: Re: Fw: Rodenticides

> here is what we would require on the bait station label:

- > 1. Product name and reg. number.  
> 2. Active ingred statement  
> 3. Signal word  
> 4. referral to full labeling  
> 5. What Tier level it is

>  
> From: Russell Wasem/DC/USEPA/US  
> To: Dan Peacock/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA  
> Cc: Laura Parsons/DC/USEPA/US@EPA  
> Date: 10/25/2011 08:00 AM  
> Subject: Fw: Rodenticides

> Is there guidance somewhere for what must be on a bait station's label?

> Rusty\_\_\_\_\_

> ----- Forwarded by Russell Wasem/DC/USEPA/US on 10/25/2011 07:58 AM  
> -----

> From: Bob Stoddard <bob@envirosafeipm.com>  
> To: Russell Wasem/DC/USEPA/US@EPA  
> Date: 10/24/2011 08:21 PM  
> Subject: Re: Rodenticides

>  
> Just trying to see if there is specific requirement for what labeling  
> should be on a protecta rtu station once it is installed. Is the  
> printing that comes on the rtu sufficient or is it required to have  
> additional information? According to the rodenticide label it just  
> states it must be placed in childproof station. Reading label  
> requirement it appears that the protecta rtu meets this requirement.  
> Thanks for your help.

> Bob

> Sent from my iPhone

> On Oct 24, 2011, at 8:04 PM, Wasem.Russell@epamail.epa.gov wrote:

>> Good Evening Bob,

>>  
>> Are you inquiring about whether an abbreviated label can be placed on  
>> bait stations or are you looking for the protocols for demonstrating  
>> tamper resistance of the bait station? If you are looking for the  
>> protocols, please see the end of the Risk Mitigation Decision for Ten

>> Rodenticides (attached). Please let me know if you are inquiring  
> about  
>> an abbreviated label or something else.  
>> (See attached file: Risk Mitigation Decision.pdf)  
>>  
>> Regards,  
>>  
>> Rusty\_\_\_\_\_

>> Rusty Wasem / Chemical Review Manager  
>> Risk Management & Implementation Branch 1\*  
>> Pesticide Re-evaluation Division\* / Office of Pesticide Programs  
>> 703 / 305 6979  
>>  
>>  
>> From: Bob Stoddard <bob@envirosafeipm.com>  
>> To: Russell Wasem/DC/USEPA/US@EPA  
>> Date: 10/24/2011 01:23 PM  
>> Subject: Rodenticides  
>>  
>>  
>> Dear Sir,  
>>  
>> Can you please give me the specific legal requirements for labeling of  
> a  
>> childproof rodent bait station? Thank you.  
>>  
>>  
>> Bob Stoddard  
>> President  
>> EnviroSafe, Inc.  
>> www.envirosafeipm.com  
>> www.envirosafeturf.com  
>>  
>>  
>> <Risk Mitigation Decision.pdf>  
>  
>  
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